



October 13, 2022

The Honorable Ronnie Abrams
United States District Court for the Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *In Re Petition of Maginalised Affected Property Owners*, No. 1:21-mc-00681

Dear Judge Abrams,

Pursuant to this Court's order dated August 17, 2022, the Parties respectfully file their Joint Status Report.

Petitioner MAPO filed this Application on August 19, 2021. ECF 1. To minimize litigation of this matter, the parties agreed that BSGR would produce documents to Petitioner in response to this application under the same confidentiality agreement that is applied in the Chapter 15 bankruptcy proceedings. The parties agreed that MAPO's counsel would conduct a review of the documents, and determine which of the documents MAPO intends to use in the foreign proceedings. The parties will then engage in any discussions regarding the appropriate confidentiality for those documents.

MAPO's counsel has finalized and shared the list of documents they intend to use in the Sierra Leone proceedings. While the parties anticipate that they will come to an agreement on confidentiality without the Court's intervention, the parties respectfully request that the Court wait to close the case until confidentiality decisions have been resolved.

Respectfully submitted,

/s/ Marco B. Simons

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